

# Exhibit A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MISSOURI PRIMATE FOUNDATION, )  
et al., )  
                                  )  
Plaintiffs and )  
Counterclaim Defendants, )  
                                  )  
v. )                              Case No. 4:16-cv-02163  
                                  )  
PEOPLE FOR THE ETHICAL )  
TREATMENT OF ANIMALS, INC., et al., )  
                                  )  
Defendants and )  
Counterclaim Plaintiffs. )

**COUNTERCLAIM PLAINTIFFS' REQUEST FOR  
ENTRY UPON LAND FOR PURPOSES OF INSPECTION**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. and Angela Scott ("Plaintiffs") request entry upon designated land located at 12338 State Rd. CC, Festus, MO 63028, in the possession or control of Counterclaim Defendant Connie Braun Casey ("Defendant"), for the purpose of Plaintiffs' representatives' inspection and measuring, surveying, photographing and taking video and audio recordings (collectively, the "Inspection") of the property to the extent such property pertains to the conditions of confinement, treatment, and husbandry practices involving the chimpanzees that are the subject of the above-captioned lawsuit (the "Chimpanzees").

The request for inspection includes the following designated areas: (a) those areas in which the Chimpanzees are or were being held for any period of time, including but not limited to indoor enclosures, outdoor enclosures, and temporary holding enclosures, and (b) those areas that pertain to the maintenance and care of the Chimpanzees, including but not limited to areas where food is stored and prepared, and places where other associated supplies such as bedding, cleaning supplies, enrichment articles, medicine, and equipment are kept.

The request for Inspection includes the Chimpanzees during interactions with staff or volunteers, without staff or volunteer interaction, and without staff or volunteers present, and the following designated practices and/or procedures:

- (a) Defendant's practice and procedure for preparing food for the Chimpanzees;
- (b) Defendant's practice and procedure for feeding food to the Chimpanzees;
- (c) Defendant's practice and procedure for all daily routine housekeeping of the enclosures of the Chimpanzees, including but not limited to cleaning;
- (d) Defendant's practice and procedure for recalling the Chimpanzees, or shifting them to particular areas within their enclosures;
- (e) Defendant's practice and procedure for providing enrichment for the Chimpanzees;
- (f) Defendant's practice and procedure for routine daily observations and monitoring of the physical and mental health of the Chimpanzees;
- (g) Defendant's practice and procedure for sanitizing the enclosures of the Chimpanzees;
- (h) Defendant's practice and procedure for monitoring the Chimpanzees' teeth and dental health care, including but not limited to taking photographs and video footage of their teeth;
- (i) Defendant's practice and procedure for collecting fecal, urine, and blood (if possible without the use of anesthesia) samples from the Chimpanzees.

Following completion of the items (a) through (i) of the Inspection, Plaintiffs request permission to record the Chimpanzees for up to an additional eight (8) hours using small, static video cameras that are left running at the facility overnight to observe the Chimpanzees without any humans present or human presence anticipated. Plaintiffs' representative will retrieve the cameras the following morning.

The Inspection will occur on July 25, 2018, beginning at 9 a.m. and continue from day to day until completed. The Inspection shall be recorded by sound, and/or video and/or real-time transcription notary public, or other person duly authorized to administer oaths.

Dated: June 19, 2018

Respectfully submitted,

/s/ Jared S. Goodman  
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*Attorneys for Defendants/  
Counterclaim Plaintiffs*

## CERTIFICATE OF SERVICE

I certify that on June 19, 2018, the foregoing notice of deposition was served by electronic mail and regular mail as follows:

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/s/ Jared Goodman